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Advogados

VIA ECF AND EMAIL

April 17, 2018

The Hon. Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004

***Picard v. South Ferry Bldg. Co. et al., Adv. Pro. Nos. 10-4387, 10-4488,
10-4350, and 10-5110***

Dear Judge Bernstein:

We represent each of the defendants in the Lowrey, South Ferry, South Ferry 2, and Mesora proceedings referenced above. Our clients are preparing to file a joint consolidated memorandum of law in support of objections filed pursuant to Rule 9033 to this Court's March 22, 2018 Proposed Findings of Fact and Conclusions of Law on cross-motions for summary judgment entered in each adversary proceeding.

We respectfully request permission for these defendants to file a single joint overlength brief of up to 75 pages. This increase is necessary to adequately address the legal arguments and distinct facts raised by four different sets of defendants in distinct adversary proceedings. Counsel believe that a single joint consolidated memorandum will present the issues more efficiently than separate memoranda filed in each proceeding.

Counsel for the Trustee consents to this request, provided that the Trustee and SIPC are allotted the same number of pages as necessary. The defendants have no objection to the Trustee and SIPC's request. We appreciate your attention to this request.

Respectfully,

/s/ Richard A. Kirby

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Cc: Nicholas Cremona
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Granted
SmB
4/17/18